MEMO ENDORSED

LAW OFFICES DAVID WIKSTROM

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October 10, 2020

The Honorable Katherine Polk Failla United States District Judge Southern District of New York 40 Centre Street New York, NY 10007

> Re: <u>United States v. Greg Miller</u> 20 CR 134 (KPF)

Dear Judge Failla:

I represent Defendant Greg Miller, and submit this letter motion on his behalf seeking a modification of the travel limits of his bail as set forth below. The Government, by AUSA Timothy Capozzi, does not object to the applicatio.

Mr. Miller was released on the day of his surrender, February 18, 2020, on a \$250,000 appearance bond, with travel limited to the Southern and Eastern Districts of New York. Mr. Miller has been fully compliant with his bail conditions at all times.

I respectfully request that his travel limitations be extended to include Pennsylvania (and New Jersey, through which he will have to drive) on October 18 and October 25, 2020. Mr. Miller is assisting his friend (and bond cosigner) Irina Bronshteyn, performing work on her weekend home in the Poconos. Mr. Miller's location and travel hours will be provided to Pretrial Services in advance.

Mr. Miller and I are available at any time for a conference, should the Court require additional information or have other questions. I thank the Court for its consideration.

Sincerely,

David Wikstrom

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Application GRANTED. Mr. Miller is permitted to travel to Pennsylvania on October 18, 2020, and October 25, 2020, and return to New York the same day.

Dated: October 13, 2020

New York, New York

SO ORDERED.

HON. KATHERINE POLK FAILLA UNITED STATES DISTRICT JUDGE

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